

REMARKS

Status of the Claims

- Claims 1-20 are pending in the Application.
- Claims 1-20 are rejected by Examiner.
- Claims 1, 8-10, 12-20 are amended.

Interview

Applicant thanks the Examiner for granting a telephone interview on July 2, 2007. During that interview, Applicant discussed how the prior art reference Hargraves fails to address the elements present in the invention. Applicant amends the claims to more clearly recite the invention and as such, the claims can be distinguished from the teachings of Hargraves. The Examiner agreed to review the amended claims in light of the interview discussion and the amended claims as submitted in this response.

Claim Amendments

Applicant amends independent Claims 8 and 17 to more clearly recite the invention. Dependent claims are amended to comport with independent claims. Amendments are supported via Figures 4a and 4B of the as-filed specification and the supporting text.

Claim rejections pursuant to 35 U.S.C. §103(a)

Claims 1-14, and 19-20 stand rejected pursuant to 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,950,987 to Hargraves et al. (Hargraves) in view of U.S. Patent Publication No. 2003/0233621 to Paolini et al. (Paolini). Applicant respectfully traverses the rejection.

Hargraves teaches a remote document management system for use with wireless devices having limited capabilities to remotely edit and manage documents located on a central server. As stated in the summary portion, Hargraves states that the one objective of the teaching of Hargraves is "...to provide a method for remote editing of documents in which a formatted document is modified to separate the format information from the text

information. The text information is transmitted to a remote wireless device according to the remote device's capabilities, where it is edited and returned for recombination with the saved formatting information.” (Hargraves, col. 2, lines 18-24).

Thus, Hargraves separates the text portion of a document from the formatting portion of a document, allows the text portion to be edited at a remote device, and then returns the edited text portion back into the formatted portion. Hargraves separates the formatting of the document from the text portion of the document. This separation of format and text is described in Hargraves in col. 3, line 56 through col. 4 line 12 as follows:

“In accordance with the present invention, server 12 processes the request for document 17 from remote device 30 as follows. Document 17 is first converted into a rich text format (i.e., ".RTF") document, if it does not already exist in electronic storage 16 in such form. In the preferred embodiment, RTF form is used to permit the associated document to be reproduced as ASCII characters, but other suitable file formats may be used as well. Processor 14 then processes document 17 in RTF form to create a segmented structure document 42. Segmented document 42 illustratively exists in a preferred embodiment as an XML string and comprises two segments: a format segment 44 and a text segment 46. Format segment 44 includes the format information (e.g., paragraph identifiers, type fonts, page layout styles, etc.) and the identification information necessary to determine where each of the format items fits or occurs within original document 17. Text segment 46 contains the text portion of document 17, with identifying information that permits the user to determine what a particular portion of text represents in the original document (e.g., paragraph titles, paragraph markers, etc.). Format segment 44 and text segment 46 are broken into small blocks of data, with each block having an assigned segment number for location identification purposes.” (Hargraves, Col. 3, line 56- col. 4 line 12).

Amended independent Claim 1 recites that the first modified file contains both original text and automatic character modifications made by an editing program. This is in distinction to the teachings of Hargraves which first separates out a text portion of an RTF document from the formatting portion of the RTF document before sending to a remote device for user text editing. Whereas Hargraves always splits out the text portion of a document from the formatting portion of the document, the invention of amended Claim 1 never separates out such portions because the first modified file contains both original text

and automatic formatting. The recitation of amended independent Claims 8 and 17 also has a first modified file including the original text and the character modifications made automatically by a software development system editor. Thus, the methods of Hargraves and amended independent Claims 1, 8, and 17 differ substantially in how the document under consideration is handled.

The Office Action dated 4/27/07 on page 4 indicates that Hargraves does not expressly teach that the server makes automatic modifications in a software development system editor for editing source code or that the final file is an HTML file. Applicant agrees. However, Applicant respectfully disagrees that Paolini teaches the missing elements.

Paolini teaches an enhanced method and system for generating and editing source code such as web pages and software which is subject to information processing such as version control and differencing comparison. In the Paolini approach, formatted source code is first separated into effectual code and ineffectual style definitions. (See Abstract)

Specifically, Paolini at paragraphs 0033 and 0034 teaches some basic attributes of the approach as follows, in relevant part:

“[0033] In a first aspect of the invention, source files which usually consists of formatted text are separated into style descriptors and pure content files, depending on the syntax of the language being used. For example, if a software engineer is developing a program in "C", the syntactical rules for the "C" language are used to determine what text in the file is effectual (or "content") for the logic of the program, and the rest of the characters and codes in the file are deemed to be "style" definitions. ...

[0034] The content file and the style descriptors are then processed separately by the information processor which is content-sensitive, such as a software version control system check in comparison process or a web page differencing engine for a web search engine. This allows the information processor to consider only effectual changes to the data item being processed, such as actual code changes which will result in logical program changes in a compiled software product, or such as actual content differences which appear in a new version of a web page.” (Paolini, Paragraphs 0033, 0034)

Paolini thus first separates out text and formatting similar to Hargraves. Paolini then applies separate processing to the content file and the style descriptors. As noted above amended independent Claims 1, 8, and 17 function without such a separation of text and formatting. Neither Hargraves nor Paolini teach the element of a first modified file having original text and formatting which is modified automatically by a software development editor. In a more broad sense, neither Hargraves, nor Paolini, considered separately or considered combined, teach the same method that is recited in independent Claims 1, 8, and 17. Applicant respectfully submits that the combination of Hargraves and Paolini teach away from the amended independent Claims 1, 8, and 17 because Hargraves and Paolini require separation of an input file into two pieces: the text portion of a file and the formatting portion of a file, whereas the amended claims keep the text and formatting together in a file as part of the recited method.

Since the combination of Hargraves and Paolini fail to disclose all of the elements of amended independent Claims 1, 8 and 17, and actually teach away from the claimed invention, then the combination of Hargraves and Paolini cannot render obvious the amended claims and their respective dependent claims under 35 U.S.C. §103(a) per MPEP §2143.03. Applicant respectfully requests withdrawal and reconsideration of the 35 U.S.C. §103(a) rejection because the pending claims patentably define over the cited art.

Claims 15-16 and 17-18 stand rejected pursuant to 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,950,987 to Hargraves et al. (Hargraves) in view of U.S. Patent Publication No. 2003/0233621 to Paolini et al. (Paolini) and in further view of U.S. Patent No. 6,336,124 to Alam et al. (Alam). Applicant respectfully traverses the rejection.

Alam discloses a method for extracting data from digital data representing a document, such as a printed document or of an Internet webpage. The Alam method generally comprises locating words from the digital data of the document in the original or input format, joining the located words into lines, joining the lines into paragraphs, locating tables from the joined paragraphs, converting the paragraphs and tables to an intermediate format, and outputting the information into an output format. (See Alam, col. 1 line 60 through col. 2 line 1).

However, as with Hargraves and Paolini above, Alam fails to disclose a first modified file which contains original text and modified formatting that is automatically changed under the influence of a software development editor environment as recited in amended independent Claims 1, 8, and 17.

Since the combination of Hargraves, Paolini, and Alam fails to disclose all of the elements of Claims 15-16 and 17-18, then the combination cannot render these claims obvious under 35 U.S.C. §103(a) per MPEP §2143.03. Applicant respectfully requests withdrawal and reconsideration of the 35 U.S.C. §103(a) rejection because the pending claims patentably define over the cited art.

Conclusion

Applicant respectfully requests reconsideration of all pending claims in light of the discussion provided above.

Respectfully Submitted,

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